

**BEFORE THE INDEPENDENT ETHICS COMMISSION
STATE OF COLORADO**

CASE NO. 19-25

**In the Matter of
ROBBIE LEVALLEY, Delta County Administrator**

RESPONSE TO COMPLAINT

Robbie LeValley, Delta County Administrator, through her undersigned counsel, and pursuant to Rule 7.J of the Independent Ethics Commission Rules of Procedure, respectfully submits the following Response to the Complaint filed against her by JoAnn Kalenak:

I. The Complaint.

The Complaint alleges that Robbie LeValley, Delta County Administrator, violated Section 1(d) of Article XXIX of the Colorado Constitution – a declaration that “Any effort to realize personal financial gain through public office other than compensation provided by law is a violation of [the public] trust.” Complainant alleges that Ms. LeValley “used county funds to purchase products from a business in which she owns a substantial interest” – Homestead Natural Meats (“Homestead”). The total sum at issue is \$805.49, consisting of two purchases by Delta County from Homestead on August 7, 2019, in the amounts of \$573.30 and \$232.19. The Complaint is supported by a US Bank credit card statement showing the use of a County credit card in Ms. LeValley’s name for these two purchases, a County purchase order signed by Ms. LeValley, and a credit card slip and receipt for each of the two purchases. Additional documentation includes a Homestead web screen shot and news article disclosing that LeValley Ranch – operated by Mark and Robbie LeValley and their sons – is one of six local ranches

associated with Homestead (plus a couple additional purchase orders totaling \$358.52 from 2013 and 2017).¹

II. The Applicable Law.

In addition to the general declaration noted above, Respondent respectfully submits that the following legal principles are applicable to consideration of this Complaint:

Per §24-18-109(2)(b), C.R.S. (2019) – part of the statutory “Code of Ethics” for public officers, officials, and employees – a “local government official” (including an appointed official such as a County Administrator) shall not perform “an official act” “directly and substantially affecting to its economic benefit a business or other undertaking in which he . . . has a substantial financial interest.” An “official act” is defined as “any vote, decision, recommendation, approval, disapproval, or other action, including inaction, which involves the use of discretionary authority.” §24-18-102(7), C.R.S. (2019).

The Commission has also cautioned public officials to avoid “appearances of impropriety,” *e.g.*, “voting on or debating questions in a manner that may lead the public to perceive that the local government official is either placing his or her own private business interests in a position of competitive advantage or keeping his or her own private business interests from being adversely affected by the decisions of the governing body.” Advisory Opinion 16-05 (Conflict of Interest).

¹ The County documents were apparently obtained through an Open Records Act request by the Complainant to Delta County in September 2019 directed specifically to records of “all payments made to Homestead Meats from 2012” – the year in which Ms. LeValley commenced her job as Delta County Administrator – “to present.” Resp. Ex. E.

III. Ms. LeValley's Position with Delta County .

Ms. LeValley is the Delta County Administrator. Resp. Ex. A, ¶1. As such, she is appointed by, reports to, receives direction from, and is supervised by the elected members of the Board of County Commissioners. Resp. Ex. A, ¶2. She has held this position since October 1, 2012. Resp. Ex. A, ¶1. As such, she is a "local government official" per §24-18-102(6), C.R.S. (2019).

IV. Homestead Natural Meats.

Homestead Natural Meats (a/k/a Colorado Homestead Ranches, Inc.) is a retail and wholesale seller and processor of beef and other meat products that has operated in Delta County, Colorado, since 1995. Resp. Ex. A, ¶¶3, 5. Homestead is owned by six local ranches, which ranches also supply product to Homestead. Resp. Ex. A, ¶3; Resp. Ex. D. One of those ranches is LeValley Ranch – a relationship which is prominently disclosed to the public on Homestead's website. Resp. Ex. A, ¶3 (RL-2). LeValley Ranch, in turn, is owned by a limited liability limited partnership among Ms. LeValley's husband and two members of his family. Resp. Ex. A, ¶4 (RL-3). Robbie LeValley, individually, has no ownership interest in either LeValley Ranch or Homestead. Resp. Ex. A, ¶4

Homestead and one other company – Callaway Packing – are currently the only USDA (United States Department of Agriculture) certified meat packing facilities located in Delta County. Resp. Ex. A, ¶5. Additionally, Homestead is the only USDA certified facility in Delta County that guarantees to obtain its meat exclusively from ranches and feedlots that are located in Delta County. Resp. Ex. A, ¶5; Resp. Ex. B.

Over the years, the County has made occasional purchases of meat from Homestead. Of the approximately \$3,000 in total purchases, \$1,164.01 (inclusive of the \$805.49 at issue here) have occurred during Ms. LeValley's tenure as County Administrator commencing in October 2012. Complainant's Complaint; Resp. Ex. A, ¶6.

V. The \$805.49 Purchases from Homestead for the 2019 County Fair.

In January 2019, Delta County's new Public Information Officer, Darnell Place-Wise, approached the County Commissioners during a work session with a proposal to hold a "community night" – including a barbecue hosted by the Commissioners at the County Fairgrounds – during the County Fair to be held in August. Resp. Ex. B; Resp. Ex. C; Resp. Ex. A, ¶7. The Commissioners were supportive of the idea, and Ms. Place-Wise began work on planning for the event. Resp. Ex. B; Resp. Ex. C.

Numerous work sessions and discussions took place during the next few months between the Commissioners – and particularly the Chair, Don Suppes – and Ms. Place-Wise regarding plans for the "community night" event. Resp. Ex. B; Resp. Ex. C. Ms. LeValley had little involvement in these discussions. Resp. Ex. B (attachment); Resp. Ex. C; Resp. Ex. A, ¶8. Commissioner Suppes emphasized that the County Fair was the premier agricultural event in the county and that the "community night" event should be serving Delta County beef. Resp. Ex. B. Commissioner Suppes notes that "Homestead Meats is the only place to purchase USDA certified retail Delta County beef." Resp. Ex. B. Ms. Place-Wise agreed, and suggested using "Homestead for the meat and Callaway Packing for everything else for the BBQ." Resp. Ex. C. She was directed by Commissioner Suppes to proceed in this manner. Resp. Ex. B; Resp. Ex. C.

Hamburgers were ultimately purchased from Homestead at wholesale for \$573.30², while a variety of other items were purchased from Callaway Packing for \$1,357.14. Resp. Ex. A, ¶11.

On July 2, the County Fair Board asked the Commissioners if the County would be willing to donate meals at the Fair for board members and judges. At the Commissioners' request, Ms. LeValley contacted Homestead and inquired what product might be available for this and was told by its manager that Homestead would be willing to provide smoked brisket for a reduced price of \$232.19.³ Ms. LeValley conveyed this information to Commissioner Suppes. Commissioner Suppes approved and authorized the purchase. Resp. Ex. A, ¶12.

Other than the limited inquiry to Homestead regarding the briskets noted above, Ms. LeValley's sole involvement in the purchases from Homestead was her signing of the purchase orders previously authorized by Commissioner Suppes and allowing Ms. Place-Wise to use her County credit card to pay for the authorized purchases. This resulted from Ms. Place-Wise being hired as the County's Public Information Officer very late in 2018, after the County's budget for 2019 had been largely finalized, and therefore being without a dedicated departmental budget and County credit card of her own for that budget year. Resp. Ex. A, ¶10.

Equally important, Commissioner Suppes – who, as Chair of the Board of County Commissioners, was the principal decision-maker on behalf of the County regarding all the matters at issue and directed the purchases in question – was fully aware of Ms. LeValley's family's association with Homestead. Resp. Ex. B.

² The hamburgers were priced at \$1.14 rather than Homestead's normal retail price of \$1.50. Additional Information submitted to IEC by Respondent Jan. 10, 2020.

³ The briskets were priced at \$6.89 rather than normal retail price of \$6.99. Additional Information submitted to IEC by Respondent Jan. 10, 2020.

VI. Ethical Considerations.

Of critical importance, the proposals and decisions to purchase meat from Homestead for the “community night” and Fair board and judges’ meals were not Ms. LeValley’s proposals or decisions, nor did she participate materially in discussion or debate regarding the purchases. She exercised no discretionary authority whatsoever regarding the matter. Her only involvement was ministerial in nature – signing off on two purchase orders authorized and directed by the Chair of the Board of County Commissioners and allowing a newly hired County officer to use her County credit card on a temporary basis for these purchases.

As important, the County officials acting with discretionary authority – particularly the Chair of the Board of County Commissioners – were fully aware of Ms. LeValley’s family’s connection with Homestead. This was, in fact, general public knowledge in a relatively small community by virtue, if nothing else, of its clear disclosure on Homestead’s website.⁴ Moreover, the primary reason for the Commissioners’ decision and Ms. Place-Wise’s recommendation to make the subject purchases from Homestead is eminently understandable and impactful in context – Homestead was the only business from which to purchase USDA certified meat in Delta County where the meat was also guaranteed to come from ranches and feedlots located in Delta County, all in the context of a “community night” at the Delta County Fair intended to acknowledge and celebrate Delta County agriculture.

Of perhaps lesser importance, but worth note, is the insubstantiality of the any economic benefit to Homestead (which provided its product to the County at wholesale and discount),

⁴ Indeed, this prominent public disclosure is the principle evidentiary offer on the point in Complainant’s Complaint and focus of the Open Records request precipitating these proceedings.

together with Ms. LeValley's attenuated financial interest in any such benefit. Even in the context of "appearances of impropriety," it is difficult to discern any material competitive advantage or benefit afforded Homestead beyond its own existing commitment to USDA certification and sourcing exclusively from Delta County ranches and feedlots.

As a final consideration, Respondent would respectfully note that the constitutional and statutory formulations of the ethical rules applicable to public officials, as well as the Commission's opinions and adjudications over the years, show a sensitivity to both the public interest and the practicalities of public service. Thus the emphasis on the exercise of discretionary authority, materiality and substantiality of interests and effects, and full disclosure of potentially conflicting interests. This is particularly true in smaller communities, where it would be impractical and a disservice to everyone to create an impenetrable wall between public service and any level of family participation in the business community. In the present case, Respondent respectfully submits that the public trust has not been violated in any way by Ms. LeValley – who at all times was acting solely at the direction of a fully informed Chair of the Board of County Commissioners exercising full discretionary authority – nor is there a reasonable basis for discerning even an arguable appearance of impropriety.

Respectfully submitted this 13thth day of March, 2020.

TIERNEY LAWRENCE LLC

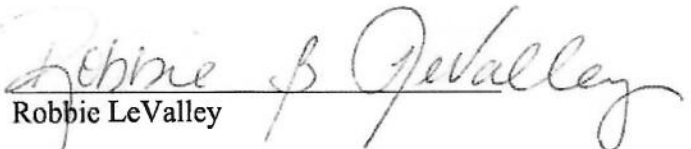


Edward T. Ramey, Reg. No. 6748
Tierney Lawrence LLC
225 East 16th Avenue, Suite 350
Denver, CO 80203
Phone: 720-242-7585
Email: eramey@tierneylawrence.com

Attorneys for Respondent Robbie LeValley

AFFIRMATION

I, Robbie LeValley, have read the foregoing Response to Complaint and affirm that, to the best of my knowledge, information, and belief, all statements set out in the Response are true.


Robbie LeValley

AFFIDAVIT OF ROBBIE LEVALLEY

I, Robbie LeValley, being first duly sworn upon oath, state as follows:

1. I am the County Administrator for Delta County, Colorado. I have served in this position since October 1, 2012.

2. As County Administrator, I am appointed by, report to, receive direction from, and am supervised by the Board of County Commissioners.

A. Homestead Natural Meats.

3. Homestead Natural Meats is a tradename held by Colorado Homestead Ranches, Inc. Exhibit RL-1. As is disclosed on Homestead's website, six local cattle ranches hold ownership interests in, and provide meat product to, Homestead. One of those ranches is LeValley Ranch. Exhibit RL-2. I have no ownership interest in Homestead.

4. LeValley Ranch is wholly owned by LeValley Ranch II, Ltd., R.L.L.P., a Colorado limited liability company, whose general and limited partners are Mark LeValley, Henry LeValley, and Steven LeValley. Exhibit RL-3. Mark LeValley is my husband. I am not a partner and have no ownership interest in this entity,

5. Homestead Natural Meats has operated in Delta County since 1995. It and Callaway Packing are currently the only USDA (United States Department of Agriculture) certified meat packing facilities located in Delta County. Homestead is – additionally – the only USDA certified facility in Delta County that also guarantees to obtain its meat exclusively from ranches and feedlots that are located in Delta County.

6. In the wake of the filing of this Ethics Complaint against me, I have researched the records of Delta County and verified that the County has made occasional purchases of meat

from Homestead both prior and subsequent to my being hired by the County in October 2012. These purchases totaled \$1,827.98 prior to October 2012, and \$1,164.01 subsequent thereto (including the purchases questioned in this complaint).

B. The Delta County Fair purchases.

7. In early 2019, Delta County's new Public Information Officer and Marketing and Tourism Director, Darnell Place-Wise, suggested at a Commissioners' work session that the County sponsor a "Community Night" – including a barbecue – at the Delta County Fairgrounds during the County Fair to be held in August. In keeping with their goal of increasing public awareness and use of the Fairgrounds, the Commissioners were supportive of the idea.

8. The planning for the "Community Night" continued through subsequent work sessions with the Commissioners from January through July. I had little involvement in these discussions. While I recall that the Commissioners directed Ms. Place-Wise to highlight Delta County agriculture at the "Community Night" event, I at no time directed, encouraged, suggested, or asked Ms. Place-Wise, the Commissioners, or anyone else to purchase meat for the event from Homestead.

9. I believe that it was common knowledge – and was prominently disclosed on Homestead's website (Exhibit RL-2) – that LeValley Ranch was a part owner of Homestead.

10. As the County budget for 2019 was almost complete when Ms. Place-Wise was hired by the County in November 2018, no department budget had been allocated to her position and no County credit card had been issued to her. It was therefore my responsibility, as County Administrator, to sign all purchase orders, and I permitted her to use my County credit card, for expenses allocated to her department during this period.

11. Ms. Place-Wise contacted both Homestead and Callaway Packing directly and secured their product for Community Night at the fair. This involved purchase of hamburgers at wholesale (\$0.36 under retail cost) for \$573.30 from Homestead, plus \$1,357.14 for a variety of items from Callaway.

12. At the request of the County Fair board, the Commissioners were asked if they would donate meals for judges and fair board members. It was suggested that Homestead might have product that would fit this purpose, and I agreed to contact Homestead and inquire. Homestead's manager told me that they would be willing to provide smoked brisket for a reduced price totaling \$232.19, and this information was passed along to Commissioner Suppes. Commissioner Suppes approved and authorized that purchase. I signed the purchase orders for Ms. Place-Wise for both of these purchases, and both were charged to my County credit card.

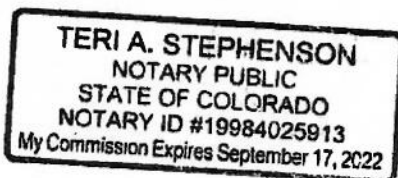
Robbie B. LeValley
Robbie LeValley

State of Colorado)
) ss.
County of Delta)

Subscribed and sworn to before me by Robbie LeValley, in the County of Delta, State of Colorado, this 11th day of March 2020.

Witness my hand and official seal.

My Commission Expires 9.17, 2022



Teri A. Stephenson
Notary Public



Colorado Secretary of State
Date and Time: 06/11/2009 03:39 PM
ID Number: 20091322148

Document must be filed electronically
Paper documents will not be accepted.

Document processing fee
Fees & forms/cover sheets
are subject to change.

\$20.00

Document number: 20091322148
Amount Paid: \$20.00

To access other information or print
copies of filed documents,
visit www.sos.state.co.us and
select Business Center.

ABOVE SPACE FOR OFFICE USE ONLY

Statement of Trade Name of a Reporting Entity

filed pursuant to §7-71-103 and §7-71-107 of the Colorado Revised Statutes (C.R.S)

1. For the reporting entity delivering this statement, its ID number, true name, form of entity and the jurisdiction under the law of which it is formed are

ID Number	<u>19961126612</u> <i>(Colorado Secretary of State ID number)</i>
True name	<u>COLORADO HOMESTEAD RANCHES INC.</u>
Form of entity	<u>Corporation</u>
Jurisdiction	<u>Colorado</u>

2. The trade name under which such entity transacts business or conducts activities or contemplates transacting business or conducting activities in this state is

Homestead Natural Meats

3. A brief description of the kind of business transacted or activities conducted or contemplated to be transacted or conducted in this state under such trade name is

Retail and Wholesale Beef, Pork and Lamb. Custom Processing of beef, pork, lamb & wildgame

4. *(If the following statement applies, adopt the statement by marking the box and include an attachment.)*

☐ This document contains additional information as provided by law.

5. *(Caution: Leave blank if the document does not have a delayed effective date. Stating a delayed effective date has significant legal consequences. Read instructions before entering a date.)*

(If the following statement applies, adopt the statement by entering a date and, if applicable, time using the required format.)

The delayed effective date and, if applicable, time of this document are _____
(mm/dd/yyyy hour:minute am/pm)

Notice:

Causing this document to be delivered to the Secretary of State for filing shall constitute the affirmation or acknowledgment of each individual causing such delivery, under penalties of perjury, that such document is such individual's act and deed, or that such individual in good faith believes such document is the act and deed of the person on whose behalf such individual is causing such document to be delivered for filing, taken in conformity with the requirements of part 3 of article 90 of title 7, C.R.S. and, if applicable, the constituent documents and the organic statutes, and that such individual in good faith believes the facts stated in such document are true and such document complies with the requirements of that Part, the constituent documents, and the organic statutes.

This perjury notice applies to each individual who causes this document to be delivered to the Secretary of State, whether or not such individual is identified in this document as one who has caused it to be delivered.

6. The true name and mailing address of the individual causing this document to be delivered for filing are

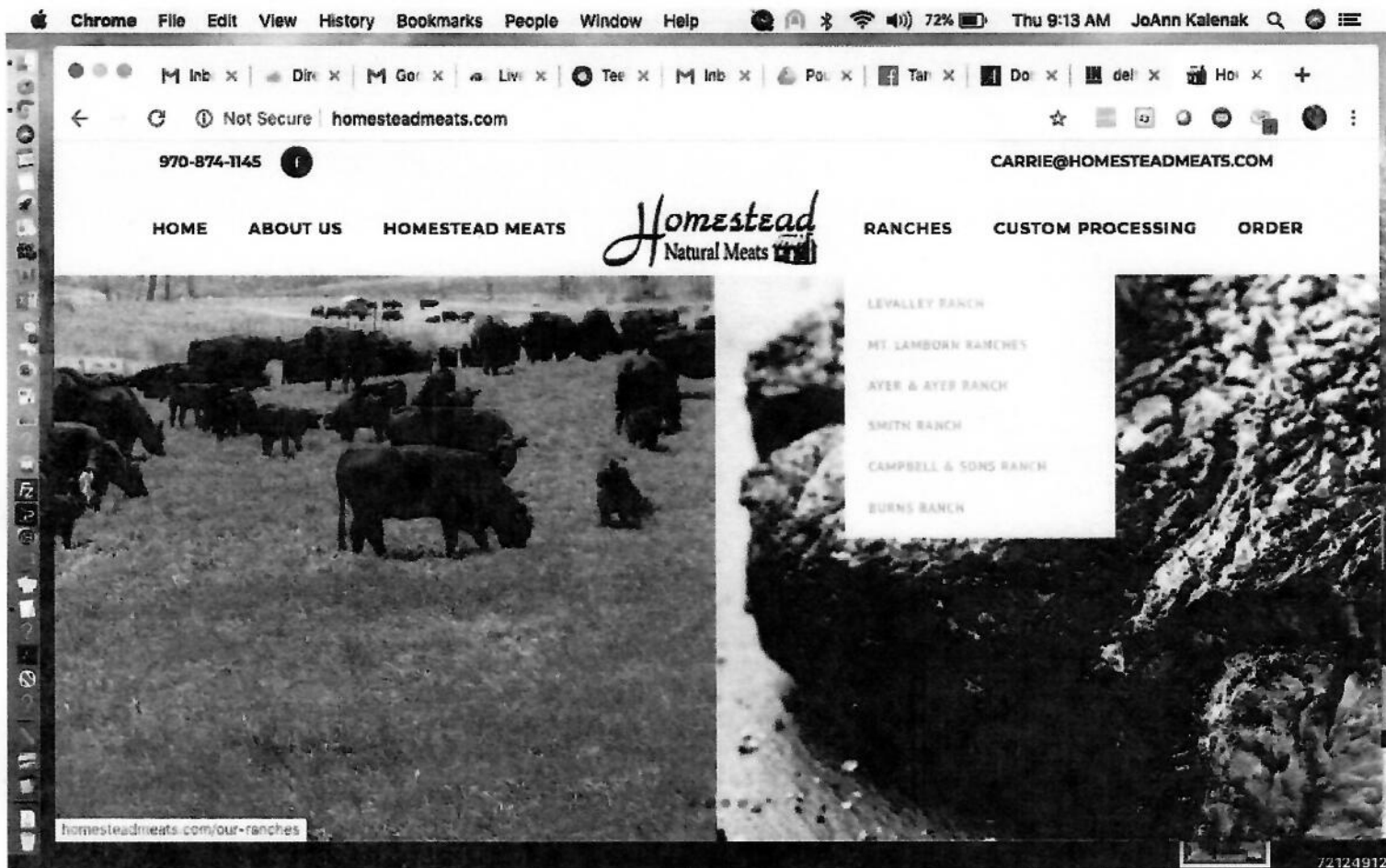
<u>Campbell</u>	<u>Calvin</u>		
<small>(Last)</small>	<small>(First)</small>	<small>(Middle)</small>	<small>(Suffix)</small>
<u>741 West 5th Street</u>			
<small>(Street number and name or Post Office Box information)</small>			
<hr/>			
<u>Delta</u>	<u>CO</u>	<u>81416</u>	
<small>(City)</small>	<small>(State)</small>	<small>(Postal/Zip Code)</small>	
<u>United States</u>			
<small>(Province – if applicable)</small>		<small>(Country – if not US)</small>	

(If the following statement applies, adopt the statement by marking the box and include an attachment.)

- ☐ This document contains the true name and mailing address of one or more additional individuals causing the document to be delivered for filing.

Disclaimer:

This form/cover sheet, and any related instructions, are not intended to provide legal, business or tax advice, and are furnished without representation or warranty. While this form/cover sheet is believed to satisfy minimum legal requirements as of its revision date, compliance with applicable law, as the same may be amended from time to time, remains the responsibility of the user of this form/cover sheet. Questions should be addressed to the user's legal, business or tax advisor(s).



EX. A - RL-2



Jeremy P. Cohen
jcohen@bfwlaw.com

March 3, 2020

To Whom it May Concern:

Dear Ladies and Gentlemen:

I am legal counsel for LeValley Ranch II, Ltd., R.L.L.P., a Colorado limited liability limited partnership and have been its counsel since its formation.

Its only general and limited partners include Mark LeValley, Henry LeValley and Steven LeValley.

Robbie LeValley is not a partner and has no ownership interest in this entity.

If you have further questions, please contact me at the email address listed above or call me, at the phone number listed below.

Sincerely,

Jeremy P. Cohen,
Special Counsel,
Burns, Figa & Will, P.C.

EX. A - RL-3

March 2, 2020

To whom it may concern,

In January of 2019 I was elected as chairman of the Board of Delta County Commissioners.

Darnell Place/Wise was given the task of improving use/awareness of the Delta County Fairgrounds. One of the ideas Ms. Place/Wise developed was a Community Night during the County Fair. The board agreed to this let Darnell plan the event.

Darnell and I had numerous conversations regarding the logistics of the Community Night and we discussed the purchase of meat for the event. I told her that The County Fair was the premier agriculture event in the county and we should be serving Delta County beef. Homestead Meats is the only place to purchase USDA certified retail Delta County beef.

I was fully aware of Ms. LeValley's involvement in Homestead Meats when I made the decision to use Homestead Meats as the provider of meat for the community night and when I gave staff approval for payment of the bill. I did not discuss this issue with Ms. LeValley.

Thank you

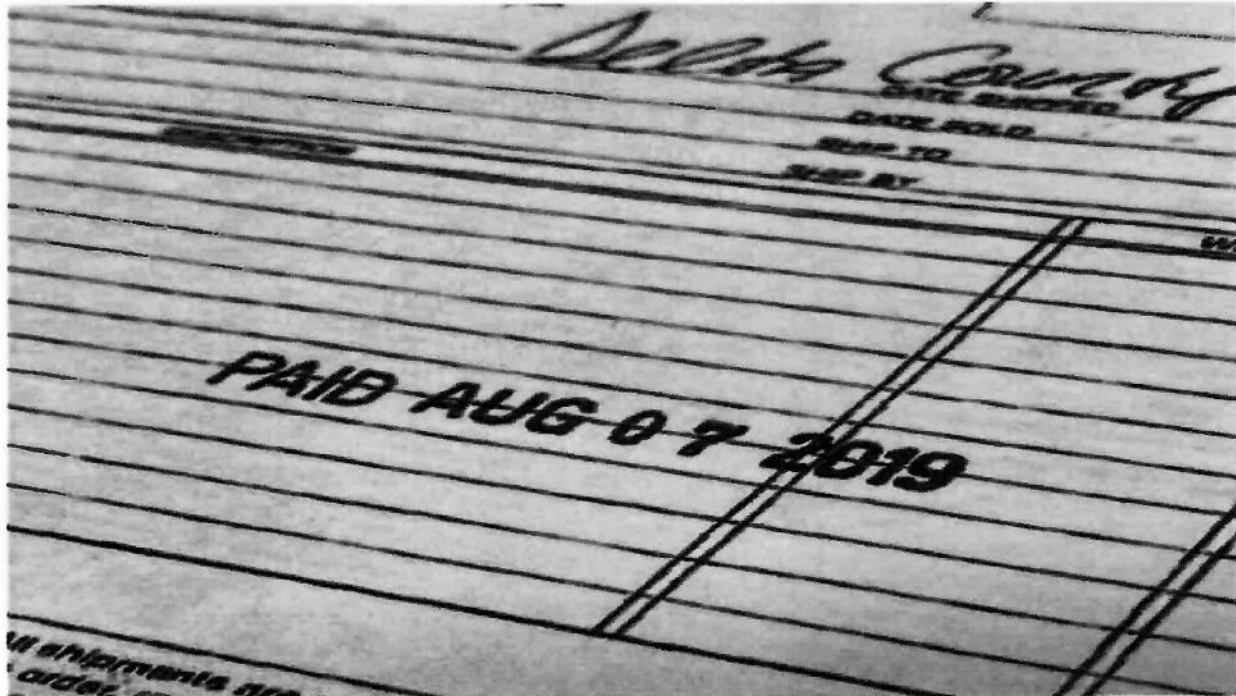
A handwritten signature in black ink, appearing to read 'Don Suppes', with a stylized, flowing script.

Don Suppes

Delta County Commissioner, Dist. 2

EXHIBIT B

Officials defend Delta County Administrator after ethics report



By Jason Burger | Posted: Wed 6:46 PM, Feb 19, 2020

DELTA, Colo. (KKCO/KJCT)-- A newly released report suggests the Delta County Administrator spent county funds to benefit her own business.

However, officials say it's not that cut and dry.

The report comes from the Colorado Independent Ethics Commission, and they ruled the complaint "non-frivolous" on February 11th.

Bank records and documents show over \$800 was spent on meat and supplies for a community night funded by Delta County in August of 2019.

Delta County Commissioners defend Administrator Robbie LeValley, and they say a meat company she co-owns, Homestead Natural Meats, was the best supplier of food and supplies for a community night last August.

"I was the one that said we need to make sure to provide Delta County beef at an event like this. She was simply doing what was asked of her, and it wasn't even her event, it was one of the other folks that ordered the meat," said Delta County Commissioner Don Suppes.

The IEC says LeValley has until March 13th to file a response to the complaint, and then they will decide if they will investigate.

AFFIDAVIT

Don Suppes, Delta County Commissioner, being first duly sworn upon oath, states and affirms that the factual statements contained in my attached letter dated 3-2-2020, are true and correct to the best of my information, knowledge, and belief.

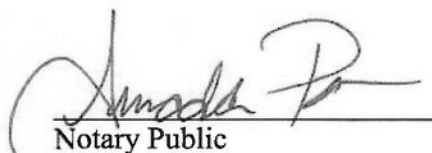
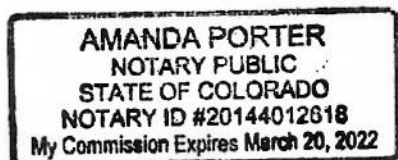


State of Colorado)
) ss.
County of Delta)

Subscribed and sworn to before me by Don Suppes, in the County of Delta, State of Colorado, this 5th day of March 2020.

Witness my hand and official seal.

My Commission Expires March 20, 2022


Notary Public



February 27, 2020

To Whom It May Concern:

I had the idea of a community night at the Delta County Fair, after years of attending the community night for the Montrose County Fair. In January of 2019, I asked the Commissioners in a work session, if we could replicate that in terms of a big community BBQ that would be put on by the Commissioners; they were supportive of this idea. At that time, I was put in charge of coordinating the BBQ, which was to take place on Tuesday, August 6, 2019.

I worked on pulling the BBQ together from January through May, and provided additional information to the Commissioners in a work session on May 30, 2019.

I am very accustomed to trying to use local whenever possible, from my previous role as the Chamber director; the County's approach is in line with that approach, as well. In June of 2019, I communicated with Commissioner Suppes that I wanted to use Homestead for the meat and Callaway Packing for everything else for the BBQ, just as I had done at the Chamber for the Farmer Rancher luncheon, during Deltarado Days. I was given permission to move forward.

I was solely responsible for all of the decisions around the community BBQ. I ordered the meat from Homestead, and ordered the remainder of food items and supplies from Callaway Packing. I organized delivery of Callaway the afternoon of August 6, 2019, and asked Robbie to please pick up the meat from Homestead on her way up to Hotchkiss after the Board of County Commissioners' meeting, as I was already up in Hotchkiss setting up the BBQ.

Never at any time did Robbie participate in the event coordination, or decision making of the community night BBQ.

Kind Regards,

Darnell Place-Wise
Public Information Officer
Marketing and Tourism
Executive Assistant to County Commissioners and County Administrator

EXHIBIT C

AFFIDAVIT

Darnell Place-Wise, being first duly sworn upon oath, states and affirms that the factual statements contained in my attached letter dated February 27, 2020, and addressed To Whom It May Concern, are true and correct to the best of my information, knowledge, and belief.

Darnell Place-Wise

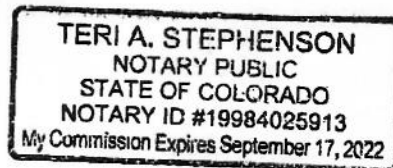
State of Colorado)
) ss.
County of Delta)

Subscribed and sworn to before me by Darnell Place-Wise, in the County of Delta, State of Colorado, this 4th day of March 2020.

Witness my hand and official seal.

My Commission Expires 9.17, 2022

Teri A. Stephenson
Notary Public



C·D·H

CLAY, DODSON & HUFFMAN, P.C.

415 PALMER STREET · P.O. BOX 38, DELTA, COLORADO 81416
[970] 874-9777 / FAX [970] 874-7224

March 11, 2020

To Whom It May Concern:

I represent Colorado Homestead Ranches, Inc., a Colorado corporation. This letter is to certify that the following shareholders each own an equal one-sixth (1/6) share in the Corporation:

1. LeValley Ranch II, Ltd RLPP
2. Karl & Joetta Burns
3. Gary & Amy Peebles
4. Mt. Lamborn Livestock, LLC
5. Campbell & Sons
6. Norman & Suesan Smith

If you have any questions regarding the information contained in this letter, please feel free to contact me.

Sincerely,



Julie J. Huffman

EXHIBIT D

Delta County

REQUEST FOR INSPECTION / COPIES OF PUBLIC RECORD(S)

Date of Request: Sept. 27, 2019

Applicant's Name: JoAnn Kalenak, President, Delta County Citizen Report

Address: 36435 Sunshine Mesa Rd., Hotchkiss, CO (PO Box 1321, Paonia, CO 81428)
(Street) (City) (State) (Zip)

Phone Number: 970-433-3218 Fax Number: n/a

Email Address: citizenreport1@gmail.com

Description of Requested Document: 1) Digital copies of all payments made to Homestead Meats from 2012 to present; 2) Digital copies of all invoices, receipts, purchase orders or other records of purchases from Homestead Meats made by any and all staff and/or elected official from 2012 to present; 3) Digital records of purchases from Homestead Meats that denote the purpose of the purchase, who made the purchase, the amount of the purchase, and the date of the purchase from 2012 to present.

JoAnn L Kalenak

Signature

Sept. 27, 2019

Date

Cost Estimate:

_____ # of pages at \$0.25 each = _____
_____ # of hours at \$30 per hour = _____

Total Cost Estimate: _____

I understand that I may be charged for the public records requested in accordance with the Colorado Open Records Act (CORA) and the Delta County Public Records Act policy. I confirm my request for records described, and agree to pay 100% of the charges in advance of the records being made available.

Signature

Date

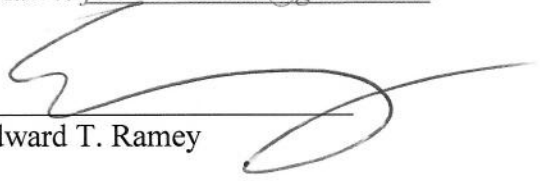


www.DeltaCounty.com

EXHIBIT E

CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of March, 2020, I filed a true and correct copy of the foregoing with the Independent Ethics Commission via email to iecinfo@state.co.us and served a copy of same upon Complainant JoAnn Kalenak via email to joannkalenak@gmail.com.



Edward T. Ramey